

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT
OF TENNESSEE AT NASHVILLE

Corey Taylor
Plaintiff

v.

Trinity Service Group
Defendant

Case NO. 3:22-cv-00920

JUDGE: Campbell

Magistrate Judge: Newbern

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AUG 27 2024

U.S. District Court
Middle District of TN

Petition for leave to file a motion

Requesting for the court to Intervene

Plaintiff, Corey Taylor Respectfully seeks to move this court to intervene and issue an order or whichever this court feels proper, so the Defendant will not have access to Plaintiff's Full Medical History due to Plaintiff's Full Medical History is not relevant to this matter. Plaintiff seeks this for the following reasons:

Factual Background

Plaintiff filed/commenced this action 11/14/2022 Doc. NO. 1 against Defendant for violations of his constitutional rights whereas, Defendant was aware that a duty of care was owed to the Plaintiff and Defendant disregarded that care and failed to provide Plaintiff with a required diet which resulted in physical injuries of Plaintiff on numerous occasions. Defendant Trinity deliberately disregarded Plaintiff's serious medical need not to have spicy foods. This court has decided Plaintiff stated a colorable claim and Plaintiff has stated

Trinity failed to properly train and supervise the inmates who handle the special diet trays at DCSO-DDC, which due to this failure has resulted in plaintiff suffering injuries, as described in his initial complaint Doc. NO. 1.

Statement of Facts

In a letter dated 7/25/2024 served upon plaintiff via U.S. Mail from the newly appearing counsel Sean C. Wlodarczyk, Esq. The attorney requested that plaintiff provide Defendant with a complete copy of his medical records, stating that "when you file a claim putting your medical condition at issue, any confidentiality right or privileged associated with the records of your medical treatment is waived".

Argument

The above statement will be true if this was a case of Medical Malpractice or medical denial, but as seen this is not a Medical Malpractice case. This matter on the merits is to decide whether or not if Trinity acted negligent, in a total disregard to matters known as Trinity was culpably aware that plaintiff was ordered by a Medical Physician to have a Bland Diet. Trinity was aware that such diet or any diet's are required due to a Medical condition cause the request for any specialized diet is submitted by a Doctor's order and Doctor's order only. This order regarding plaintiff's diet was submitted via a Doctor's order/physician order and this made Trinity aware and its employees and inmate workers aware that plaintiff had a serious medical and such need necessitated a specialized diet. Defendant is not entitled into a complete

That proves he has an existing medical condition and that his condition necessitates him to be on a Bland Diet "Spicy Free". Plaintiff also filed with this court portions of his medical record he had in his possession relevant to this matter. Plaintiff's medical History is not relevant to these facts, The one that is, is the one Plaintiff has submitted. A Duty of care was owed to Plaintiff and Trinity Disregarded, Ignored and acted sufficiently Deliberate towards that need and Plaintiff was Injured as a result. Plaintiff Retained the right as a pre-trial Detainee to be Free From Deliberate indifference to a serious medical need under the Due process Clause of the fourteenth Amendment." Greene, 22 F.4th at 605. Plaintiff Did not claim that his medical condition was at issue warranting Defendant a full and complete copy of Plaintiff's Medical Records. Plaintiff stated he has a diagnosed serious Medical condition "oral lichen Planus" and such condition warrants Plaintiff to adjust his Diet and to not consume acidic foods, spicy foods or salts cause of the Damage/Injuries that will result to any existing oral ulcers, or lichen Planus which spicy foods will immediately cause swelling, exacerbation of ulcers, cause Gum bleeding, or cause ulcers to burst etc. as was the case on Numerous occasions with Plaintiff. Plaintiff Respectfully seeks this court to intervene and stop Defendant from harassing Plaintiff about his complete Medical History and stating Plaintiff is not complying with their request for production of documents, as this court is Fully aware that Plaintiff has filed these Exhibits with the court already as the court has reviewed, and any other medical records that are irrelevant to the Required Diet that was ordered by Dese-wellepath Medical Doctor shall not be Viewed cause they are not relevant.

Conclusion

File is not relevant to the failed acts of Trinity. Plaintiff provided and filed with this court Lab results, Doctor order noting that plaintiff is to have a Diet with NO Spices "Bland Diet" Plaintiff has also submitted Medical Report showing he was administered and injected with Dexamethazone in October 2022 due to a severe reaction he had after consuming spicy food served to him by Trinity despite being labelled "Taylor, Corey Bland Diet Non-Spicy". This court shall Rule in favor of plaintiff and prohibit defendant from continuously asking, harassing and demanding plaintiff to provide his full Medical Record when his Medical condition is not at question in this matter.

Respectfully Submitted
Corey Taylor

Conclusion

I certify that the foregoing was mailed to U.S. Court, M.D. Tenn via U.S. Mail on the 19th day of August 2024 to be filed and heard by the court and reviewed via CM/ECF by all parties involved

Submitted
Corey Taylor

Corey Taylor, 534419
TCIX-main

1499 R.W. Moore Memorial Hwy
Only, TN 37140

Privileged Legal
Mail

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Middle District of TN

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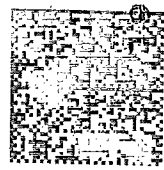
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37203-709493

The Department of Corrections
has neither inspected
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